



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

DEC 18 2015

Patricia L. Neubacher
Acting Regional Director, Pacific West Region
Channel Islands National Park
1901 Spinnaker Drive
Ventura, CA 93001

Attn: Scorpion Pier Project

Subject: Draft Environmental Impact Statement for the Scorpion Pier Replacement Project,
Channel Islands National Park, Santa Barbara County, California.
(CEQ# 20150284)

Dear Ms. Neubacher:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Scorpion Pier Replacement Project, Channel Islands National Park, Santa Barbara County, California. Our review is provided pursuant to the National Environmental Policy Act, the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and our review authority under Section 309 of the Clean Air Act.

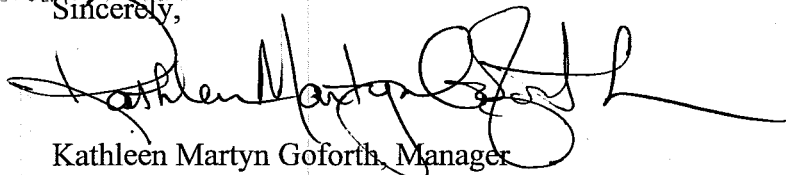
EPA supports the National Park Service's goals of protecting fundamental resources, such as marine, terrestrial, cultural and archeological assets. We also support the project's goals to improve park operations, such as visitor experience and safe access to Santa Cruz Island. Based on our review of the Draft EIS, we have rated the proposed project as Lack of Objections (LO) (see attached "Summary of EPA Rating Definitions"). Our rating is based on Preferred Alternative 2.

The proposed action includes mitigation measures to minimize the adverse impacts from construction or operation of the pier. The Draft EIS provides a robust summary of the proposed mitigation measures and a commitment to fully map the project area for sensitive wetland habitats and biota prior to construction (Page: 164). EPA recommends that the NPS include such mapping in the Final EIS, rather than waiting until after the Record of Decision has been issued and pre-construction has started.

We appreciate that page 63 of the Draft EIS includes reference to the Council on Environmental Quality's draft guidance on greenhouse gas emissions. We are glad to see that the project calls for climate change mitigation such as steel piles designed to "structurally raise the pier in the future, if necessary. In this way, the new pier is adaptable to increasing sea level rise and climate change," (page: 25 of the DEIS).

EPA appreciates the opportunity to review this Draft EIS. When the Final EIS is released, please send one hard copy and one CD to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3521, or have your staff contact James Munson, the lead reviewer for this project at (415) 972-3852 or Munson.James@epa.gov.

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Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen Martyn Goforth", written over a horizontal line.

Kathleen Martyn Goforth, Manager
Environmental Review Section

Enclosure: Summary of the EPA Rating Definitions

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment